

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DORMAN ANGEL, et al.	:	CIVIL ACTION NO. C-1-01-467
	:	
Plaintiffs	:	JUDGE: BECKWITH
	:	MAGISTRATE JUDGE: SHERMAN
vs.	:	
	:	
UNITED PAPERWORKERS	:	<u>PLAINTIFFS' MOTION FOR</u>
INTERNATIONAL UNION (PACE)	:	<u>EXTENSION OF TIME IN WHICH TO</u>
LOCAL 1967, et al.	:	<u>RESPOND TO DEFENDANT PACE</u>
	:	<u>LOCAL 5-1967'S MOTION FOR</u>
Defendants	:	<u>SUMMARY JUDGMENT</u>

Now come Plaintiffs, by and through counsel, and hereby request until March 24, 2005 in which to response to Defendant PACE Local 5-1967's ("Local PACE") motion for summary judgment. A memorandum in support of said motion follows herein.

RESPECTFULLY SUBMITTED,

/s/ Mark J. Byrne

MARK J. BYRNE - #0029243

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MEMORANDUM

On February 1, 2005, Defendant Local PACE filed its motion for summary judgment. Plaintiffs request until March 24, 2005 in which to respond to the motion. Co-Defendant Paper, Allied Industrial, Chemical & Energy Workers Union, AFL-CIO ("International PACE") filed its motion on March 2, 2005. Some of the issues are similar in each motion. Therefore, Plaintiffs will file their response to the Local PACE motion at the same time as their response to the International PACE. Plaintiff has conferred with counsel for Local PACE, Robert Doggett, and he does not oppose the request for the extension.

RESPECTFULLY SUBMITTED,

/s/ Mark J. Byrne

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CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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I also certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

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